

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

YETI Coolers, LLC,

Plaintiff,

v.

**Love Deals Inc. and Endliss Technology
Inc.,**

Defendants.

Case No. 1:23-cv-00079-RP

DECLARATION OF SEN CAI

I, Sen Cai, declare as follows:

1. I am the Secretary and Chief Financial Officer of Endliss Technology Inc. (Endliss), a defendant in the above-captioned action.
2. I am making this Declaration in support of Defendants' Motion to Dismiss for Lack of Personal Jurisdiction, for Improper Venue, or in the Alternative to Transfer.
3. I have personal knowledge of the facts stated herein, and if called as a witness, could testify competently thereto.
4. Endliss is a California Corporation.
5. Endliss is located at 30773 Weigman Road, Hayward, California 94544.
6. Endliss has no offices in Texas.
7. Endliss has no sales representatives or agents in Texas.
8. Endliss has no employees in Texas.
9. Endliss holds no real property in Texas.
10. Endliss maintains no bank accounts in Texas.

11. Endliss has no physical business presence in Texas.
12. In the Complaint, Plaintiff has accused certain tumblers sold by Endliss of trade dress infringement (Accused Tumblers).
13. Endliss has not sold products, including the Accused Tumblers, to Texas retailers for resale in Texas.
14. Contrary to the allegation of Paragraph 6 of the Complaint, Endliss does not have Taxpayer No. 32075857162 (Exhibit 1, attached). Endliss does not have a Texas taxpayer number.
15. Endliss does not sell any products of any kind, including the Accused Tumblers, directly to customers in the state of Texas.
16. Endliss operates the website at Atlin Sport, <https://www.atlinsport.com> (Exhibit 2).
17. Endliss advertises but does not sell the Accused Tumblers through its website, www.endlisstech.com.
18. Endliss only sells the Accused Tumblers through Atlin Sport through Amazon.com. The Atlin Sport website refers purchasers to Amazon.com storefronts to purchase the Accused Tumblers.
19. Endliss sells the Accused Tumblers through Atlin Sport only through “Fulfillment by Amazon” or “FBA.”
20. Endliss ships the Accused Tumblers that are sold via FBA to an Amazon warehouse located in Ontario, California.
21. Endliss has no control over where Amazon ships the Accused Tumblers.

22. All Endliss personnel having knowledge of the marketing and sales of the Accused Tumblers are located in California.

23. All documents relating to the marketing and sales of the Accused Tumblers by Endliss are located in California.

24. Defendant Love Deals, Inc. (Love Deals) is a sister company of Endliss.

25. Love Deals is California Corporation.

26. Love Deals is located at 34972 Newark Boulevard, Suite 160, Newark, California 94560.

27. Love Deals has no offices in Texas.

28. Love Deals has no sales representatives or other agents in Texas.

29. Love Deals has no employees in Texas.

30. Love Deals holds no real property in Texas.

31. Love Deals maintains no bank accounts in Texas.

32. Love Deals has no physical business presence in Texas.

33. Love Deals does not market or sell the Accused Tumblers.

34. Love Deals has not sold products, including the Accused Tumblers, to Texas retailers for resale in Texas.

35. Love Deals does not sell the Accused Tumblers to customers in the state of Texas.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.



Sen Cai

EXHIBIT 1

TAX ID SEARCH

This search was performed with the following search parameter:

TAX ID : 32075857162

There are no records which match your inquiry.

Return to Order

New Search

- Instructions:
- ☐ To view additional information pertaining to a particular filing select the number associated with the name.
 - ☐ To place an order for additional information about a filing select the radial button listed under 'Mark' that is associated with the entity and press the 'Order' button.

- SOSDirect - Business Filings
 - Business Copies and Certificates
 - Uniform Commercial Code
 - Texas Businesses Against Trafficking
 - Texas.gov
- VoteTexas.gov - Voter Information
 - Register to Vote & Voter I.D.
 - Website Policies
 - Open Records
 - Contact us
- Texas Homeland Security
 - Where the Money Goes
 - Fraud Reporting
 - Texas Veterans Portal



EXHIBIT 2

ATLIN

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OUR PRODUCTS



Atlin Tumbler

This cup maintains both hot and cold temperatures due to two layers of insulation. Built tough to handle wherever life takes you.

Atlin snorkel mask

This full face snorkel mask lets users get more out of their underwater adventures. The 180° viewing area is wider than traditional scuba gear to provide an unmatched experience.



Atlin Silicone Sleeve

Atlin Silicone Sleeve, Protective Bottle Rubber Bottom for Hydro Flask, Durable Anti-Slip Boot Cover for Stainless Steel Water Cup, Portable Pet Bowl for Dog Feeding [Dishwasher Safe]

This silicone lightweight and durable sleeve comes in 3 colors (black, turquoise, cobalt) and 2 different sizes (small, large) for each color, keeping the bottom of your water bottle protected from everyday mishaps while you're on-the-go.

UPC: 600231107266, 600231107273, 600231107280, 600231107297, 600231107303, 600231107310

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Where to Buy

ATLIN products are exclusively manufactured and imported

ATLIN SPORT INC.

30940 San Clemente St, Hayward, CA 94544

Email: support@atlinsport.com

The following amazon stores are authorized to carry authentic ATLIN products:

Amazon Store: **[Power-Innovation](#)**

Amazon Store: **[Moment Distribution](#)**

Amazon Store: **[Nice Dream Retail](#)**

Only products purchased from authorized distributor are qualified for manufacturer warranty.

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